

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
ST. JOSEPH DIVISION**

STACY ARNOLD,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Case No. 19-06137-CV-SJ-BP
CITY OF ST. JOSEPH,	)	
ST. JOSEPH PUBLIC LIBRARY,	)	
OFFICER REBECCA HAILEY (IN HER	)	
PERSONAL AND PROFESSIONAL CAPACITY)	)	
	)	
	)	
Defendants	)	

**FIRST DECLARATION OF STACY ARNOLD**

COMES NOW, Stacy Arnold, upon her own oath and penalty of perjury, and states the following:

1. I am above the age of 18, have personal knowledge of the facts contained in this declaration, and am competent to testify as to the facts stated herein.
2. The I am the Plaintiff in this case and the documents that I have filed, including the complaint in which I explain how I was petitioning, were written by me.
3. As stated in my complaint, on January 30, 2018, I was petitioning to raise the minimum wage in front of the East Hills Library, a library within the St. Joseph Public Library branch.
4. I also petitioned in front of the Library on January 27, 2018, for most of the day. No one from the Library asked me to change or amend anything about the way I was petitioning on January 27, 2018.

5. I did not assault, attack, or approach anyone in a challenging or aggressive way, on either of these days. Nor did I impede anyone's ingress or egress from their vehicles.

6. To any extent that "accost" is defined to mean more than actively approaching people, I have never accosted anyone.

7. On January 30, 2018, I did not forget or disregard all of my canvassing skills, nor did I canvass any differently than I did on January 27, 2020.

8. As stated in my complaint, in general, when I petition I will smile and greet people when I see them and then approach them, casually, but non-threateningly, as though I am approaching a friend. If anyone indicates that they are not a registered voter, have already signed the petition, do not support the petition or want me to go away, I smile at them and say something friendly, like have a good day. This is the way that I was petitioning on January 27, 2018 and January 30, 2018.

9. On January 27, 2018 and January 30, 2018, lots of folks at the Library were registered voters, were interested in raising the minimum wage, and signed the petition.

10. As I stated in my complaint, I did ask people in their vehicles to sign the petition. I do this by positioning myself about five (5) feet from vehicles, holding up the petition, making eye contact and smiling.

11. On January 30, 2018, it was quite cold. I remember putting on thick gloves multiple times and wearing warm socks, boots, and a thick coat.

12. As a general matter, if I am canvassing in the cold, I find that some people I approach outside will want to look over and/or sign a petition in their vehicles where they are able to run the heat, especially if their hands are occupied (children, bags, books).

13. I do not remember if anyone signed the petition from inside of a vehicle on January

30, 2018, but in all likelihood they did, in which case I would have been in the parking lot as the vehicle occupant who signed the petition was likely talking to me as they were signing and would have needed to pass the clipboard back to me.

14. I did not block anyone's ingress or egress from their vehicles, or harass or badger anyone who indicated they were not interested.

15. The majority of the signatures I gathered from the Library were obtained from the sidewalk, and I was located on the sidewalk for the majority of the time I was there.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Further declarant sayeth not.

Executed on November 14, 2020



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Stacy Arnold